REMARKS

Claims 48-84 were presented for examination and were pending in this application. In an Office Action dated March 20, 2008, claims 48-84 were rejected. Applicants have amended claims 48, 55, 65, 74 and 78. Applicants now respectfully request consideration of the application in view of the above amendment and the following remarks.

Response to Rejection Under 35 USC 103(a)

In the 4th paragraph of the Office Action, Examiner rejected claims 48-61, 63-71, 73-80 and 82-84 as allegedly being unpatentable over U.S. Patent No. 6,631,386 to Arun et al. ("Arun") in view of U.S. Patent Publication No. 2005/0144198 to Bergstraesser et al. ("Bergstraesser"). This rejection is overcome in view of the amended claims.

As amended, claims 48, 55, 65 and 74 variously recite "resolving a plurality of conflicts between the first version of the associative array and the second version of the associative array by receiving a plurality of user inputs responsive to identifying the plurality of conflicts, each user input specifying a conflict resolution procedure for an individual conflict." (emphasis added)

Hence, the amended claims recite generating a third version of an associative array which incorporates changes from a first version of the associative array and a second version of the associative array. Generation of the third version of the associative array also resolves a plurality of conflicts between the first version of the associative array and the second version of the associative array by receiving a plurality of user inputs. Each user input specifies a conflict resolution procedure applied to an individual conflict. Resolving a plurality of conflicts responsive to a plurality of user inputs each identifying a conflict resolution procedure for an individual conflict beneficially allows greater user control over resolution of individual conflicts.

For example, a first user input may specify that a first conflict be resolved by including data from the first version of the associative array in the third version of the associative array. Subsequently, a second user input may specify that a second conflict be resolved by including data from the second version of the associative array in the third version of the associative array. Hence, using a plurality of user inputs to resolve a plurality of conflicts beneficially allows independent resolution of individual conflicts between a set of two versions, allowing different each conflict to be resolve by selecting data from different versions. This allows increased customization of the third version of the associative array to include different data values from each version of the associative array.

Arun does not disclose at least the claimed element "resolving a plurality of conflicts between the first version of the associative array and the second version of the associative array by receiving a plurality of user inputs responsive to identifying the plurality of conflicts, each user input specifying a conflict resolution procedure for an individual conflict." Arun describes a database version control system where a database table includes "at least some" records having "a version control field including version control information." *See* Arun, col. 3, lines 58-61. Regarding the resolution of conflicts between versions, at most Arun describes a conflict resolution operation in which a user checking in a checked-out record version determines whether the checked-out record version or a record version stored in the database is preserved for later use. *See* Arun, col. 3, lines 17-20. Specifically, when a conflict exists, the user provides a single user input to select a single record version to resolve the conflict. *See* Arun, FIG. 6, item 153 and col. 17, lines 59-65. After this single user input, only the record version identified by the single user input survives after the conflict resolution operation. *See* Arun, col. 3, lines 23-26. Thus, for one or more conflicts between a first record version and a second

record version, Arun merely provides a single user input that allows the user to choose between (a) resolving all conflicts between the two record versions with data from the first record version or (b) resolving all conflicts between the two record versions with data from the second record version. *See* Arun, FIG. 6 and FIG. 6A. Arun only allows for an additional user input if conflicts exist between one or more additional sets of record versions, in which case the single user input process repeats for each set until no conflicts exist between any set of two or more record versions. *See* Arun, FIG. 6A, item 158 and col. 8. Arun does not allow a user to individually resolve multiple conflicts by selecting data from different versions using user input for each conflict encountered, but rather uses a single user input to specify the version used to resolve all conflicts encountered. Hence, Arun does not disclose at least the claimed element "resolving a plurality of conflicts between the first version of the associative array and the second version of the associative array by receiving a plurality of user inputs responsive to identifying the plurality of conflicts, each user input specifying a conflict resolution procedure for an individual conflict."

Bergstraesser does not remedy the deficient disclosure of Arun. Rather, Bergstraesser merely discloses a method for managing versions of objects where objects are only copied when absolutely necessary. *See* Bergstraesser, Abstract; ¶¶ [0014]-[0018]. To manage versions, Bergstraesser uses a data model to propagate relationships between versions and resolve conflicts affecting property values and relationship content. *See* Bergstraesser, ¶¶ [0016]-[0018]. To resolve conflicts, Bergstraesser discloses a "MergeVersion" operation which applies various rules for managing changes between multiple versions and resolveing conflicts between versions. *See* Bergstraesser, ¶ [0063] and [0065]. However, this "MergeVersion" operation merely uses a set of rules and a flag value to indicate a primary and a secondary version of an

object. The "MergeVersion" operation uses the flag setting to modify all relationships in the versions according to a predetermined set of rules. *See* Bergstraesser, ¶¶ [0067]-[0069] and Table 3. Hence, Bergstraesser uniformly applies a set of rules to all data in a version. For example, data updated in the primary version is always preserved when merging primary version and secondary version. Similarly, data deleted from the primary version is always deleted when merging the primary version and secondary version. *See* Bergstraesser, Table 3. Unlike the claimed invention, Bergstraesser does not receive user input responsive to identifying a conflict, but only receives user input prior to merging versions. Hence, the user input in Bergstraesser merely identifies a global policy applied to all conflicts encountered when merging versions. It does not specify a conflict resolution policy responsive to an identified conflict. Therefore, Bergstraesser does not disclose "resolving a plurality of conflicts between the first version of the associative array and the second version of the associative array by receiving a plurality of user inputs responsive to identifying the plurality of conflicts, each user input specifying a conflict resolution procedure for an individual conflict," as claimed.

Thus, neither of the cited references, taken alone or in combination, teaches or suggests the claimed invention. Therefore, amended independent claims 48, 55, 65 and 74 are patentably distinct from the cited references, both alone and in combination, and withdrawal of the rejection is respectfully requested.

Claims 49-54 depend from claim 48, so all arguments advanced above with respect to claim 48 are hereby incorporated so as to apply to claims 49-54. Claims 56-61, 63, and 64 depend from claim 55, so all arguments advanced above with respect to claim 55 are hereby incorporated so as to apply to claims 56-61, 63, and 64. Claims 66-71 and 73 depend from claim 65, so all arguments advanced above with respect to claim 65 are hereby incorporated so as to

apply to claims 66-71 and 73. Claims 75-80 and 82-84 depend from claim 74, so all arguments advanced above with respect to claim 74 are hereby incorporated so as to apply to claims 75-80 and 82-84. Therefore, claims 49-54, 56-61, 63, 64, 66-71, 73, 75-80 and 82-84 are patentably distinct from the cited references, both alone and in combination, and withdrawal of the rejection is respectfully requested.

In the 5th paragraph of the Office Action, Examiner rejected claims 62 and 81 as allegedly being unpatentable over Arun in view of Bergstraesser in further view of U.S. Patent No. 5,684,990 to Boothby ("Boothby"). This rejection is overcome in view of the amended claims.

Boothby does not remedy the deficient disclosures of Arun and Bergstraesser. Rather, Boothby discloses a method for synchronizing two or more databases. *See* Boothby, col. 3, lines 16-23. In Boothby, a status file containing all of the data in two databases and is used to generate a set of updating decisions used to modify each database. *See* Boothby, col. 3, lines 24-33. The set of updating decisions is then used to generate a "To-Do List" specifying how to modify the contents of each database. *See* Boothby, col. 6, lines 19-38. Hence, Boothby does not disclose "resolving a plurality of conflicts between the first version of the associative array and the second version of the associative array by receiving a plurality of user inputs responsive to identifying the plurality of conflicts, each user input specifying a conflict resolution procedure for an individual conflict," but merely discloses using a generated set of instructions to modify multiple databases.

Hence, the combination of Arun, Bergstraesser and Boothby, both alone and in combination, fail to teach or suggest the subject matter of claims 62 and 81. Therefore, claims

62 and 81 are patentably distinguishable over the cited references, both alone and in combination and withdrawal of the rejection is respectfully requested.

In the 6th paragraph of the Office Action, Examiner rejected claim 72 as allegedly being unpatentable over Arun in view of Bergstraesser in further view of U.S. Patent Publication No. 2004/0230569 to Rys et al. ("Rys"). This rejection is overcome in view of the amended claims.

Rys does not remedy the deficient disclosure of Arun and Bergstraesser. Rather, Rys discloses a method for exchanging data across different computer systems using a relational database environment. *See* Rys, ¶ [0005] and [0008]. In Rys, data is transformed between a hierarchical format, such as XML, and a rowset format, such as a relational database. *See* Rys, ¶ [0030], FIG. 2. Hence, Rys merely discloses a method for converting data from a hierarchical format to a format capable of being efficiently accessed by a query processor and makes no disclosure of merging versions of an associative array, much less of "resolving a plurality of conflicts between the first version of the associative array and the second version of the associative array by receiving a plurality of user inputs responsive to identifying the plurality of conflicts, each user input specifying a conflict resolution procedure for an individual conflict," as claimed. *See* Rys, ¶ [0035].

Hence, the combination of Arun, Bergstraesser and Rys, both alone and in combination, fail to teach or suggest the subject matter of claim 72. Therefore, claim 72 is patentably distinguishable over the cited references, both alone and in combination and withdrawal of the rejection is respectfully requested.

CONCLUSION

In sum, Applicants respectfully submit that claims 48-84, as presented herein, are

patentably distinguishable over the cited references (including references cited, but not applied).

Therefore, Applicants request reconsideration of the basis for the rejections to these claims and

requests allowance of them.

In addition, Applicants respectfully invite the Examiner to contact Applicants'

representative at the number provided below if the Examiner believes it will help expedite

furtherance of this application.

Respectfully submitted,
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